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JAN 19 1989

January 19, 1989

Federal Communications Commission
Office of the Secretary

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Ms. Donna R. Searcy
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Federal Communications Commission
Washington, D.C. 20554

87-268

Re: ~~MM Docket No. 87-268~~
Reply Comments for Sudbrink
Broadcasting Company

Dear Ms. Searcy:

Submitted on behalf of Sudbrink Broadcasting Company are an original and five (5) copies of its "Reply Comments of Sudbrink Broadcasting Company" in the above-referenced proceeding.

If there are any questions, please contact this office directly.

Respectfully submitted,

SUDBRINK BROADCASTING COMPANY

By Patrice Lyons
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Its Attorneys

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Enclosures

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JAN 19 1989

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Advanced Television Systems)
and Their Impact on the)
Existing Television Broadcast)
Service)
)
Review of Technical and)
Operational Requirements:)
Part 73-E, Television Broadcast)
Stations)
)
Reevaluation of the UHF)
Television Channel and Distance)
Separation Requirements of)
Part 73 of the Commission's Rules)

MM Docket No. 87-268

REPLY COMMENTS OF SUDBRINK BROADCASTING COMPANY

Sudbrink Broadcasting Company ("Sudbrink") supports the views expressed in the Joint Comments recently filed in this proceeding on behalf of the Association of Maximum Service Telecasters, the National Association of Broadcasters, the Association of Independent Television Stations and seventy other broadcast organizations and companies. Sudbrink submits these Reply Comments in order to encourage the Federal Communications Commission in its efforts to accommodate the potential requirements of high definition or advanced television ("ATV") systems with the continuing vitality of existing local broadcast services.

The Commission is to be applauded for its wisdom in recognizing the important public benefit that is derived from the variety of news, information and entertainment

programming now provided free of charge to the American public by local broadcasters. While alternative media of delivery have flourished over the last decade, local broadcast programming remains a vital source of information on the local or regional level. Access to diverse viewpoints is not possible where media is limited to a few, centralized outlets, and any weakening of the local broadcast system in the United States would shortly lead to a reduction in the number and variety of outlets dedicated to issues and concerns of local interest. Introduction of ATV should anticipate the needs of existing local broadcasters in order to ensure the continued availability of their services to the viewing public.

Sudbrink urges the Commission to continue to encourage the development of ATV within the existing framework of local broadcasting. See Tentative Decisions and Further Notice of Inquiry (FCC 88-288 released September 1, 1988), para. 39. Development of an NTSC compatible advanced television system or systems is a necessary starting point in the coming debates over ATV system configuration and spectrum allocations. Sudbrink would strongly oppose any ATV plans that did not provide existing local broadcasters with sufficient additional spectrum to simulcast ATV signals or to augment an NTSC signal for ATV.

In reviewing the various comments that have been submitted to the Commission in this proceeding, Sudbrink has remarked on the diversity of viewpoints expressed. It is not generally questioned, however, that the Commission has a responsibility to encourage broadcast licensees to make the necessary investments in ATV systems. Evolution toward ATV by over-the-air broadcasters is a natural and desirable process and should be supported.

The Commission has an important role to play in fostering the development of a single system standard or set of related compatible standards for ATV terrestrial broadcast transmissions. While it would not be advisable for the Commission to act hastily in setting or approving standards for ATV before the various proposed systems have been tested and shown effective, it should continue to follow closely industry work in this area and gather the data necessary for it to make an informed judgment.

In addition to work on ATV systems, the Commission should also exercise leadership in the development of standards for NTSC and ATV compatible receivers. Since it appears likely that a new generation of receivers equipped to interface with a wide variety of services will evolve, the Commission should monitor this research, and, to the

extent possible, encourage the continued compatibility of new receivers with NTSC transmissions until such time that an orderly transition to an advanced system or systems is ensured. While action to set interface standards for receivers is certainly premature, the Commission should follow developments in receiver technology with a view toward establishing standards for receiver interfaces in a future proceeding.


Finally, Sudbrink appreciates the difficult task facing the Commission in providing spectrum for all broadcasters to participate in ATV. It appreciates that, for technical reasons, trade-offs may become necessary in the number of stations permitted to operate ATV service, the size of the geographic areas served, and the amount of spectrum available to each station. See Tentative Decisions, para. 73. However, in deliberating on these issues, the Commission should bear in mind the preliminary nature of the operational data that have so far been developed on ATV systems. While interim decisions on spectrum allocation for experimental purposes may be appropriate, any such allocations should be carefully monitored to ensure that they do not interfere with existing NTSC broadcast transmissions. Sudbrink fully supports the Commission's announced intention "to analyze ATV spectrum plans in terms

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of accommodating as many existing broadcasters as possible
and encouraging the most intensive and efficient use of the
spectrum." Tentative Decisions, para. 82.

Respectfully submitted,

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January 19, 1989

CERTIFICATE OF SERVICE

I, Carol Hall, an employee of Haley, Bader & Potts, certify that on this 19th day of January 1989, I sent copies of the foregoing "REPLY COMMENTS FOR SUDBRINK BROADCASTING COMPANY" by first-class mail, postage pre-paid to the following:

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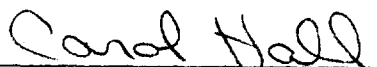
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